## THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

JAMIE LEE ANDREWS, as \* Surviving Spouse of \* MICAH LEE ANDREWS, Deceased, \* CIVIL ACTION FILE and JAMIE LEE ANDREWS, as \* Administrator of the Estate of NO.1:14-CV-03432-WSD MICAH LEE ANDREWS. Deceased. \* Plaintiff. \* \* \* v. \* MAZDA MOTOR CORPORATION. \* MAZDA MOTOR OF AMERICA, INC., \* AUTOLIV JAPAN, LTD., and \* JOHN DOES 1-5, \* Defendants.

# **NOTICE OF DEPOSITION OF DOUGLAS A. NUNAN**

TO: Douglas A. Nunan c/o Ashley W. Broach, Esq. Swift, Currie, McGhee & Hiers, LLP 1355 Peachtree St., N.E., Suite 300 Atlanta, GA 30309

COME NOW the Plaintiffs in the above-captioned matter and hereby notice the deposition of Douglas A. Nanan. The deposition will begin Friday, March 18, 2016, at 10:00 a.m. at Swift, Currie, McGhee & Hiers, LLP, 1355 Peachtree Street, N.E., Suite 300, Atlanta, GA 30309. The deposition will be by oral examination,

on cross examination, before an officer duly authorized to administer oaths for all purposes permitted by the Federal Rules of Civil Procedure and will be taken by stenographic means.

The witness is hereby directed to bring to the deposition those items identified in the Schedule A of Documents attached hereto.

Respectfully submitted this 11th day of March, 2016.

#### BUTLER WOOTEN CHEELEY & PEAK LLP

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## BALLARD & FEAGLE, LLP

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#### ATTORNEYS FOR PLAINTIFF

#### CERTIFICATE OF COMPLIANCE

Pursuant to Local Rules 5.1(B) and 7.1(D), I hereby certify that the foregoing filing complies with the applicable font and size requirements and is formatted in Times New Roman, 14 point font.

s/ Tedra L. Cannella

JAMES E. BUTLER, JR. jim@butlerwooten.com Georgia Bar No. 099625 ROBERT D. CHEELEY bob@butlerwooten.com Georgia Bar No. 122727 TEDRA L. CANNELLA tedra@butlerwooten.com Georgia Bar No. 881085 RORY A. WEEKS rory@butlerwooten.com Georgia Bar No. 113491 2719 Buford Highway Atlanta, Georgia 30324 (404) 321-1700 (404) 32101713 Fax

## **SCHEDULE "A" OF DOCUMENTS**

- 1. All correspondence generated or received in connection with this case.
- 2. Copies of all resumes used by you in connection with your consulting, academic or other professional endeavors.
- 3. Any and all contracts between you or your employer and any Defendant in this case (including its subsidiaries, parent, or related companies) or its attorneys or representatives.
- 4. The entire file generated in this case. This includes all documents you have reviewed or received in connection with this case.
- 5. All files and documents generated, received, or relied on in connection with this case, but not contained in this case file.
- 6. All documents you have reviewed, received or relied on in connection with this case.
- 7. Your billing records for this case.

#### **CERTIFICATE OF SERVICE**

This is to certify that on March 11, 2016, I electronically filed NOTICE OF DEPOSITION OF DOUGLAS A. NUNAN with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

C. Bradford Marsh, Esq.
Ashley W. Broach, Esq.
Myrece R. Johnson, Esq.
Daniel J. Kingsley, Esq.
Swift, Currie, McGhee & Hiers, LLP
1355 Peachtree St., N.E., Suite 300
Atlanta, GA 30309

Douglas G. Scribner, Esq. Jenny A. Mendelsohn, Esq. Alston & Bird LLP One Atlantic Center 1201 West Peachtree Street Atlanta, GA 30309-3424

This 11th day of March, 2016.

BY: s/ Tedra L. Cannella JAMES E. BUTLER, JR. jim@butlerwooten.com Georgia Bar No. 099625 ROBERT D. CHEELEY bob@butlerwooten.com Georgia Bar No. 122727 TEDRA L. CANNELLA tedra@butlerwooten.com Georgia Bar No. 881085 RORY A. WEEKS rory@butlerwooten.com Georgia Bar No. 113491 2719 Buford Highway Atlanta, Georgia 30324 (404) 321-1700 (404) 32101713 Fax